

JASON M. FRIERSON  
United States Attorney  
District of Nevada  
Nevada Bar No. 7709  
VIRGINIA T. TOMOVA  
Assistant United States Attorney  
Nevada Bar Number 12504  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
Virginia.Tomova@usdoj.gov  
*Attorneys for Federal Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Aharon R. Guy and Bree Watson,

Plaintiffs,

v.

Merrick GARLAND, Attorney General  
of the United States of America;  
Alejandro MAYORKAS, Secretary of  
Department of Homeland Security; Ur  
M. JADDOU, Director U.S. Citizenship  
and Immigration Services; Clyde  
MOORE, Field Office Director, Las  
Vegas Field Office U.S. Citizenship and  
Immigration Services;

Defendants.

Case No. 2:22-cv-01896-JCM-DJA

**Stipulation and Order**

**(Second Request)**

Plaintiffs Aharon R. Guy and Bree Watson, and United States of America, on behalf of Federal Defendants Merrick Garland, Attorney General of the United States of America, Alejandro Mayorkas, Secretary of Department of Homeland Security, Ur Jaddou, Director of U.S. Citizenship and Immigration Services, Clyde Moore, Field Office Director, Las Vegas Field Office U.S. Citizenship and Immigration Services ("Federal Defendants"), hereby stipulate and agree as follows:

Plaintiff filed their Complaint on November 9, 2022.

Plaintiff served the United States with a copy of the Summons and Complaint via Certified Mail on March 28, 2023.

1 The current deadline for the United States to respond to the Plaintiff's Complaint is  
2 on July 31, 2023.

3 Plaintiff and the Federal Defendants, through undersigned counsel, stipulate and  
4 request that the Court approve a 60-day extension of time, from July 31, 2023, to  
5 September 29, 2023, for Federal Defendants to file a response to the Complaint, ECF No.  
6 1. This is the second request for an extension of time.

7 Defendant's counsel was informed by the Agency that it received Plaintiffs'  
8 response to the Notice of Intent to Deny and it would need this additional time to evaluate  
9 it and adjudicate their application.

10 Therefore, the parties request that the Court extend the deadline for the United States  
11 to answer or otherwise respond to September 29, 2023.

12 This stipulated request is filed in good faith and not for the purposes of undue delay.

13 Respectfully submitted this 17th day of July 2023.

14 LAW OFFICES OF PETER L. ASHMAN

JASON M. FRIERSON  
United States Attorney

16 /s/ Peter L. Ashman  
17 PETER L. ASHMAN, ESQ.  
18 Nevada Bar No. 2285  
617 S. 8th Street, Suite B  
Las Vegas, Nevada 89101  
19 *Attorney for Plaintiff*

/s/ Virginia T. Tomova  
VIRGINIA T. TOMOVA  
Assistant United States Attorney  
Nevada Bar Number 12504  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101

20  
21 IT IS SO ORDERED:

22 

23 UNITED STATES MAGISTRATE JUDGE

24 DATED: July 18, 2023  
25  
26  
27  
28